

EXHIBIT 24-B

24-B



OPERATION, MONITORING, INSPECTION, AND MAINTENANCE PLAN

Former Rhone-Poulenc Site,
Tukwila, Washington

Prepared for:

Container Properties, L.L.C.
Tukwila, Washington

Prepared by:

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The averaging procedure and water level comparisons will be performed in the following manner:

- The 72-hour average will be calculated for both wells by collecting water levels every 15 minutes. This average will be updated every eight hours.
- The two averages will be compared to one another, and if the difference is less than 1.1 feet (the 1-foot minimum head difference required by EPA, plus a 10 percent safety factor), then the pumps will be turned on.
- The average will be updated every 8 hours. The water level data from the first eight-hour period will be discarded, and a new average will be calculated including the latest 8 hours of water levels. This recalculation will provide a new "moving" 72-hour average water level for both wells.
- The newly calculated water levels will be compared, and if the differential is less than 1.1 feet, the pumps will remain on. If the differential is greater than 1.1 feet, then the recovery pumps will be shut off by the PLC.

It is anticipated that the 8-hour recalculation period will be sufficient to control water levels, while dampening out the effects of transient water level changes. The averaging and recalculation periods may be adjusted based on operational experience. Any changes to the operation and changes in the length of these periods will be evaluated and discussed in the monthly progress reports required by the Order.

Proper operation and calibration of the transducers will be checked quarterly by comparing direct hand measurements of water levels in wells DM-8 and MW-49 collected during performance monitoring with water levels indicated on the data recorder attached to the PLC. If this comparison indicates a significant difference between actual and transducer-measured water levels, the transducer may be recalibrated or replaced.

2.2 GROUNDWATER PRETREATMENT SYSTEM

The groundwater pretreatment system includes the receiver tank, feed pump, bag filter, and GAC units, as shown on Figure 3. The receiver tank and feed pump are currently bypassed, with water from the wells routed directly to the filter and GAC units. The pretreatment system requires periodic inspection, monitoring, and maintenance for effective operation. Operations issues include potential plugging of the filter or GAC units, consumption of carbon by groundwater constituents, fouling of piping and pumps, and failure of system instruments. The groundwater treatment system will be checked onsite weekly or as needed to maintain the system. A physical inspection of the treatment system will be conducted at each weekly visit.